

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

Andrew Jordan-Michael Simmons

Case No. 1:23-mj-30093  
Judge: Morris, Patricia T.  
Filed: 03-08-2023 At 12:27 PM  
CMP USA v. Andrew Jordan-Michael  
Simmons (krc)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 6, 2023 in the county of Isabella in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 3146(a)(2)	defendant, having been released on bond, while awaiting surrender for service of sentence after conviction in the United States District Court of the Eastern District of Michigan for a violation of Title 21, United States Code, § 841, a felony punishable by more than fifteen years in prison as described in 18 U.S.C. § 3146(b)(A)(i), in Criminal Case No. 21-20244, entitled "United States of America v. Andrew Jordan-Michael Simmons," and having been directed by the court to surrender to the United States Bureau of Prisons by March 6, 2023 to the Hazelton Satellite Camp in West Virginia, did knowingly and willfully fail to surrender for service of sentence as ordered by the court, in violation of 18 U.S.C. § 3146(a)(2).

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.



*[Handwritten signature]*  
Complainant's signature

Bradley Ross, DEA

*[Handwritten signature]*  
Printed name and title



*[Handwritten signature]*  
Judge's signature

Patricia T. Morris, United States Magistrate Judge

*[Handwritten signature]*  
Printed name and title

Sworn to before me and signed in my presence.

Date: March 8, 2023

City and state: Bay City, Michigan

**AFFIDAVIT**

I, Bradley Ross, being duly sworn, depose and state the following:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a law enforcement officer currently employed by the Flint Police Department for the last three years. I also worked for the Michigan State Police for 25 years. I'm currently assigned to the the Drug Enforcement Agency (DEA) task force. During my employment, I investigated numerous incidents involving illegal narcotics.

2. I make this affidavit based on my participation in this investigation, including witness interviews by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

3. Based on the facts below, I have probable cause to believe that on March 6, 2022, Andrew Jordan-Richard Simmons committed the offense of Failure to Appear in violation of 18 U.S.C. § 3146(a)(2).

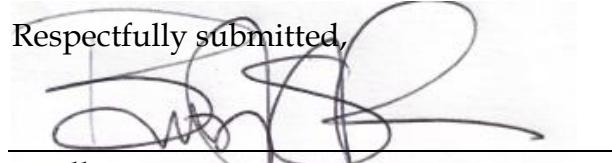
4. Simmons was indicted for various drug trafficking offenses on April 7, 2021 in case number 21-CR-20244 in federal court in the Eastern District of Michigan. Upon arraignment Simmons was released on bond. On January 26, 2023, Simmons was sentenced and told to self-surrender to the Bureau of Prisons when directed to do so.

5. On March 1, 2023 the date to self-surrender was extended by an order of the court to March 6, 2023.

6. On March 6, 2023, Simmons failed to surrender for service of his sentence at the Hazelton Satellite Camp in West Virginia pursuant to the court order.

7. As of 2:30pm on March 7, 2023, Simmons has still failed to self-surrender.

8. Based upon all of this information, probable cause exists that Andrew Jordan-Michael Simmons violated 18 U.S.C. § 3146(a)(2) on Monday March 6, 2023.

Respectfully submitted,  
  
Bradley Ross  
DEA

Sworn to before me and signed in my presence, and/or by reliable electronic means.

  
PATRICIA T. MORRIS  
UNITED STATES MAGISTRATE JUDGE